

MICHELE BECKWITH
Acting United States Attorney
JUSTIN J. GILIO
ROBERT L. VENEMAN-HUGHES
Assistant United States Attorney
2500 Tulare Street, Suite 4401
Fresno, CA 93721
Telephone: (559) 497-4000
Facsimile: (559) 497-4099

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JUAN CARLOS URIAS-TORRES,

Defendants.

CASE NO. 1:23-CR-00099-BLW-BAM

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
AND ORDER

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. Defendant is set for a status conference on **February 26, 2025**, in front of the Honorable Barbara A. McAuliffe, U.S. Magistrate Court Judge. The parties wish to **continue the status conference to July 23, 2025**.

2. This case is trailing behind the defendant's other case, U.S. v. Leiva-Leiva, 1:22-cr-00232, also being set for that date.

3. That case, in which defendant is charged with RICO Conspiracy and VICAR Murder, is more serious than the instant case and the resolution of the lead case will materially impact the resolution of this case.

4. The defendant agrees to exclude time through July 23, 2025, inclusive.

5. The parties agree and stipulate, and request that the Court find the following:

1 a) The discovery associated with this case includes investigative reports,
2 photographs and videos, as well as cellular phone extractions. All this discovery has been either
3 produced directly to counsel and/or produced to a court-appointed discovery coordinator, and/or
4 made available for inspection and copying.

5 b) Counsel for defendant desire additional time to consult with her client, conduct
6 investigation, review the voluminous discovery, prepare for a possible trial, and explore a
7 potential resolution of the case.

8 c) Counsel for defendant believes that failure to grant the above-requested
9 continuance would deny him/her the reasonable time necessary for effective preparation, taking
10 into account the exercise of due diligence.

11 d) The government does not object to the continuance.

12 e) Based on the above-stated findings, the ends of justice served by continuing the
13 case as requested outweigh the interest of the public and the defendant in a trial within the
14 original date prescribed by the Speedy Trial Act.

15 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
16 et seq., within which trial must commence, the time period of February 26, 2025 to July 23,
17 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(i), B(ii), and
18 B(iv) because the case is so unusual or so complex, due to the number of defendants, the nature
19 of the prosecution, or the existence of novel questions of fact or law, that it is unreasonable to
20 expect adequate preparation for pretrial proceedings or for the trial itself within the time limits
21 established by this section. This stipulation also results from a continuance granted by the Court
22 at defendant's request on the basis of the Court's finding that the ends of justice served by taking
23 such action outweigh the best interest of the public and the defendant in a speedy trial.

24 6. Nothing in this stipulation and order shall preclude a finding that other provisions of the
25 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
26 must commence.

IT IS SO STIPULATED.

Dated: February 19, 2025

MICHELE BECKWITH
Acting United States Attorney

/s/ Robert L. Veneman-Hughes
ROBERT L. VENEMAN-HUGHES
Assistant United States Attorney

Dated: February 19, 2025

/s/ Adilene Flores Estrada
ADILENE FLORES ESTRADA
Counsel for Defendant
Juan Carlos Urias-Torres

ORDER

The Stipulation to continue the status conference is GRANTED IN PART and DENIED IN PART. IT IS SO ORDERED that the status conference is continued from February 26, 2025 to **March 31, 2025, at 1:00 p.m. in Courtroom 5 before District Judge B. Lynn Winmill**. Pursuant to the Stipulation, time is excluded from February 26, 2025 to July 23, 2025 pursuant to 18 U.S.C. § 3161(h)(7)(A), B(i), B(ii), and B(iv).

IT IS SO ORDERED.

Dated: **February 20, 2025**

/s/ *Barbara A. McAuliffe*
UNITED STATES MAGISTRATE JUDGE